

## Tab 3

# Operational Standards



## ***47 C.F.R. § 64.604 - Mandatory minimum standards.***

*The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.*

*(a) Operational standards—*

*(1) Communications Assistant (CA).*

- (i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.*
- (ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.*
- (iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.*

The Montana Relay requires Communication Assistants to be sufficiently trained to effectively meet the specialized communications needs of individuals who are deaf, hard of hearing, and speech impaired. Montana Relay Communication Assistants also have competent skills in typing, grammar, spelling, interpretation of type written American Sign Language, and familiarity with hearing and speech disability cultures, languages and etiquette. Before taking the first call, Communication Assistants are prepared to relay calls in a fashion that exceeds FCC standards. Below Montana Relay demonstrates how it hires and trains its CAs to meet the proficiency standards stated above.

The following exams are given to each applicant before hiring to ensure that the candidate has the needed skills to become a fully trained Communication Assistant:

- (1) Spelling test (must achieve at least 90% correct)
- (2) Reading skills (must be able to read clearly and distinctly)
- (3) Typing test

### **Spelling Skills**

The minimum spelling skills required of Montana Relay Communication Assistants is the ability to quickly and easily spell words that are equivalent to that of a beginning college level conversation. The spelling skills exam includes words that are a part of the 12th grade spelling level. Communication Assistants must pass a spelling exam to be eligible to work for Montana Relay. Following is a sample spelling test an applicant must pass before being hired as a Montana Relay Communication Assistant.

# Spelling Exam

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Circle the correct spelling.

- |     |              |               |              |
|-----|--------------|---------------|--------------|
| 1.  | COPERATION   | COOPERATION   | COPPERATION  |
| 2.  | REFFERRAL    | REFERAL       | REFERRAL     |
| 3.  | BUSNESS      | BUSINESS      | BUSSINESS    |
| 4.  | BROCHURE     | BROSHURE      | BROUCHURE    |
| 5.  | POSABLE      | POSSIBLE      | POSSABLE     |
| 6.  | INSURANCE    | ENSURANCE     | INSURENCE    |
| 7.  | SUBSCRIPTION | SUBSCTIPTTION | SUBSCRIPTION |
| 8.  | CATALOG      | CATILOG       | CATOLOG      |
| 9.  | CUSTOMER     | COSTAMER      | CUSTUMAR     |
| 10. | SUBMITTED    | SUBBMITTED    | SUBMITTED    |
| 11. | ANSER        | ANSWER        | ANSWUR       |
| 12. | ADDRESS      | ADDRES        | ADRES        |
| 13. | EXTINTION    | EXTENSION     | EXTENSIEN    |
| 14. | LITATURE     | LITERATURE    | LITERITURE   |
| 15. | RECEIVE      | RECIEVE       | RESEIVE      |
| 16. | SORCE        | SOURCE        | SOARCE       |
| 17. | INFORMATION  | INFORMATIEN   | INFORMATION  |
| 18. | PHYSICAL     | PFYSICAL      | PHISYCAL     |
| 19. | COMMITMENT   | COMMITTMENT   | COMITTMENT   |
| 20. | PRAIRE       | PRAIRIE       | PRARIE       |

## **Basic Skills in Reading, Speaking, and Writing English**

Montana Relay Communication Assistants must meet all necessary grammar proficiency requirements including reading, speaking, and writing English grammar prior to employment. Communication Assistants are required to demonstrate English grammar skills at a minimum of a 12th grade level. Montana Relay tests for these skills, diction, clear and articulate voice communications, and a neutral accent by requiring each prospective CA to complete the reading exam which follows:

### **Reading Exam**

There is a new wind blowing through the quality profession. It is bringing some very different messages to those of us who manage and support the quality functions of our organizations. These messages tell us about quality in ways that are hard to reconcile with our traditional understanding of quality. They are messages like "quality is customer satisfaction" or even "quality is customer delight"; "quality people do quality work" and "quality is the expression of human excellence."

We have difficulty with the messages because, as one quality professional noted, "I don't know how to develop specifications from these ways of thinking about quality. "It is a real dilemma because our history and technology have been built upon our ability to specify, measure, and control. As long as these specifications have been based on objectively measurable phenomena like length, weight, hardness, frequency, etc., we can set standards and develop control procedures based on these standards. Now we are confronted with a way of understanding that is expressed as customer satisfaction or even customer delight. How are we to translate this into specifications and standards?

### **Ability to TYPE at 60 wpm**

Montana Relay Communication Assistants must TYPE 60 words per minute. **Montana Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level in addition to 60-wpm typing.** Montana Relay has calculated average typing speed and accuracy in its Center. The Montana Center has an average typing speed of 69.08 wpm with 97.2% accuracy.

Montana Relay administers pre-hire tests to determine the typing speed and accuracy of each applicant. This testing procedure is designed to identify applicants who have the ability to reach 60 wpm with a 95 percent accuracy level within a three-week training period. Montana Relay CAs must pass an oral-to-text typing test at a 60-wpm level with 95 percent accuracy in order to take calls on the relay floor. Montana Relay subtracts all errors to calculate typing speed.

Montana Relay makes use of a computer based typing program for enhancing keyboarding, spelling and grammar skills. This is a program that Communication Assistants can enter at various levels and continue to progress and is a very effective method of self-improvement. Montana Relay has made computers and space available in all of our centers for Communication Assistants to use this software. Montana Relay also conducts regular typing tests. Montana Relay tests its CAs every four months in a manner which simulates actual working conditions to document current proficiency levels of the Communication Assistants and to make sure CAs are making progress over the term of their employment.

### **Initial training:**

The training schedule used by Montana Relay can be found in Appendix B. A great deal of time is dedicated throughout the training process to instruct Communication Assistants on the proper

phrasing of typed ASL “gloss” and grammar, tone of voice, hearing and speech disabled cultures, TTY etiquette, pertinent information about the needs of deaf, hard-of-hearing and speech impaired users, the role of the CA, and operation of relay telecommunications equipment including answering machines and computerized services. This is done through videos, training seminars with staff who are familiar with the deaf and speech disabled communities, observation, both simulated and live calls, and a variety of role play scenarios. Montana Relay CAs are well trained to effectively meet the specialized needs of hearing and speech-disabled individuals as explained below.

All newly hired employees undergo training in the areas of American Sign Language syntax and grammar, deaf/speech impaired culture, and ethics and confidentiality before considered a fully functional employee.

Montana Relay uses a variety of trainers throughout its training period. Montana Relay’s provider has a Training Coordinator who is responsible for the overall program. This person performs all classroom training and leads role-play activities. In addition, Montana Relay’s outreach employees and Communication Assistants all play a role in training. Outreach employees teach relay user culture while Communication Assistants share general knowledge about the relay and assist with role playing activities.

CAs are introduced to basic ASL training during the first three weeks of employment. The fundamentals of ASL training include in-depth information on the deaf syntax, culture, and basic limited signing.

In addition to basic training during new hire training, Montana Relay hosts several on-site classes throughout the career of each CA related to refreshing and expanding information learned in the initial training classes.

In order to become a STS CA, an individual must pass the same tests as traditional CAs, meet the strict STS criteria and pass an STS exam. Once a CA has been accepted into the STS Program, he/she receives specialized STS training.

During the training, STS CAs learn about speech disabilities and are given specific strategies to use in order to facilitate calls between STS users and end users. STS CAs also receive detailed training on STS policies and procedures. As follow-up to the initial training, the STS Program Supervisor continually educates all STS CAs on speech disabilities, their respective implications and etiquette, through the use of a STS newsletter, STS Resource Library materials (articles, books, videos, etc.), workshops, and in-service meetings.

Montana Relay Spanish Communication Assistants must complete the same training as all traditional Communication Assistants plus pass additional test showing proficiency in the Spanish language.

### **Interpretation of Typewritten ASL**

Montana Relay trains CAs to translate limited written English to correct spoken English via intensive training in three areas. First CAs are trained to gain an understanding of how

communication impaired people write English and why. This includes syntax, abbreviations, etc. Montana Relay then instructs CAs on the proper ways to translate this form of English into correct written English. Finally, Montana Relay CAs are taught how to translate from limited written English to correct spoken English. By developing skills in these three areas and in this order Communication Assistant are much more capable of translating relay calls. Montana Relay uses videos, manuals, observation and a variety of role-play scenarios to practice these skills.

At the beginning of the training period, each Communication Assistant receives a manual covering syntax. This manual has proved to be a valuable tool for Communication Assistants as they develop their skills in this area. As a result of this manual and other types of classroom training, Montana Relay Communication Assistants are able to translate calls from limited written English language into English for the hearing party. Before relaying calls, Montana Relay CAs must pass a proficiency exam which tests the skills needed to meet this requirement.

In addition to the training described above, Montana Relay's provider has also developed an intensive translation program. This program was designed by a past President of the Registry of Interpreters for the Deaf and goes into great depth on how to perform translations from limited written English to correct spoken English and vice versa.

### **Proficiency Examinations**

Montana Relay Communication Assistants begin relaying calls at the end of the three-week training period if all proficiency skills are met including the fundamentals of ASL. Montana Relay uses several different testing mechanisms to ensure the highest quality standards in the industry. The exams measure skill levels in typing, spelling, dictation, relay procedures, including emergency call handling, characteristics of ASL as it may be reflected in the written language of TTY users, deaf, hard of hearing and speech disabled cultures, ethics and confidentiality, and professional judgement. Part of the exam process is performance based - the Communication Assistant must successfully complete several relay call scenarios. All other sections are quantifiable. Montana Relay can then determine that a Communication Assistant is meeting and exceeding all minimum FCC proficiency requirements. Tests are not available to CAs prior to testing (all tests are kept under lock and key) and portions of the tests are changed routinely. Any CA who cannot pass this examination within a three-month probationary period will not be utilized as a relay CA. CAs are tested on a variety of topics monthly to ensure that each CA continues to meet all requirements. Montana Relay retains all documentation of testing.

The performance-based testing used by Montana Relay consists of several relay tests calls. A variety of call scenarios is given to the CA to complete. Supervisors "grade" the CA on his/her ability to set-up the call, make appropriate billing arrangements, relay the call, typing and spelling accuracy, and overall proficiency of translating written ASL (when requested) and tone of voice. Various types of relay calls (i.e. VCO & HCO) are also tested.

During performance based testing Communication Assistants must demonstrate a clear understanding of deaf culture, ethics and confidentiality and professional judgement. These calls also test the CAs knowledge of relay procedures, conveyance of non-TTY and TTY user's tone of voice or expressive words.

### **CA Performance Monitoring to Ensure Each CA Continues to Meet all Requirements**

Through its relay provider's advanced relay platform, Montana Relay has established a unique "remote" call monitoring system. Montana Relay uses this call monitoring system to perform monthly evaluations. In Appendix E you will find the forms used to evaluate Communication Assistants. Such things as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated each month.

Montana Relay believes quality assurance is of the utmost importance. As a result, Montana Relay is constantly monitoring its Communication Assistants. Formal call evaluations are completed each month as well as informal "spot checking" every day to insure that Communication Assistants are performing properly on every call.

Monitoring staff are able to remotely monitor Communication Assistants so that the CA does not know when he/she is being monitored. Call monitoring can be performed at any time to ensure that all CAs are delivering high quality service on each call. Feedback is immediately given to each CA upon the completion of call monitoring.

Scores from the call monitoring are calculated and given to the CA so that progress and improvement can be tracked each month. In addition, a "center" report is generated that allows Montana Relay to monitor overall quality improvements. This system allows Montana Relay to set quality improvement goals for individuals as well as for the entire center.

Through call monitoring or as a result of poor test scores, any CA not in compliance with quality standards is pulled off the relay floor for further training and re-testing. These CAs are put on probation and monitored frequently to ensure continued improvement.

Quality measurements give Montana Relay an accurate picture of each Communication Assistant's skills as well as a record from which improvement plans can be built and future progress measured.

*(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.*

**Montana Relay, as a matter of practice, does not change Communication Assistants during a call. Even at the end of shifts, over lunch hours, and other breaks, Montana Relay CAs stay with a call until it is completed. Our experience has been that this provides much greater continuity for the user.**

Montana Relay only substitutes a CA if the following should occur:

- **A caller requests a change in gender of the CA**  
Montana Relay Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call.

- **Verbal abuse or obscenity is directed to the CA**

If a relay user becomes abusive towards a CA (calling names, etc.) or does not give a number to dial, Montana Relay's procedure is to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key is sent. If the CA is still being harassed or is not given a number to dial, a supervisor is called. The supervisor will try to process the call. If abuse continues or there is no response, a disconnect slip will be completed.

- **The call requires a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest exists**
- **Or another major emergency exists**

A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA).

If a call does need to be transferred, another CA replaces the CA relaying the call at the same workstation (using the same gender as requested), so that the relay user's call is not interrupted (except to identify the new CA to both parties). A supervisor monitors the change and must approve the change based on the criteria listed above.

Most relay centers have a common practice of substituting agents in the middle of calls to accommodate breaks, quitting times, etc. Montana Relay does not. Montana Relay is also willing to pay over-time for this type of service. **Montana Relay exceeds the FCC standard for substitution of Communication Assistants for TTY-based TRS, VRS calls and Speech to Speech TRS.**

*(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.*

Montana Relay Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call. The identity of each CA is kept confidential.

If a call does need to be transferred, another CA will replace the CA relaying the call at the same workstation (using the gender as requested), so that the relay users' call is not interrupted (except to identify the new CA for both parties). A supervisor monitors and approves the change.

*(vii) TRS shall transmit conversations between TTY and voice callers in real time.*

Montana Relay transmits conversations between TTY and voice callers in real time. Montana Relay provides real time text to voice and voice to text calls in which a deaf, hard of hearing or speech disabled person utilizing a TTY or another form of text telephone can communicate over the existing telecommunications network with a non-TTY user (and vice-versa) through the voice assistance of the relay service (Communication Assistant).

*(2) Confidentiality and conversation content.*



*(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.*

*(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.*

Montana Relay Communication Assistants are prohibited from disclosing the content of any relayed conversation, regardless of the content, and from keeping records of the content of any conversation beyond the duration of a call. Communication Assistants are also prohibited from intentionally altering a relayed conversation. Montana Relay Communication Assistants type everything verbatim unless one of the relay users involved in the conversation requests summarization or translation. At this point in time, the CA gains permission from the other party involved in the call. If both parties agree to translation, the CA will then begin to translate the call. Relay users who always want translation, can select this option on the customer profile.

All Montana Relay STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. Speech to Speech CAs are given the ability to keep records of the content of any conversation and retain information from a particular call in order to facilitate subsequent calls if requested. Speech to Speech CAs will also repeat any information (without the Speech to Speech user having to say the same thing each time) during subsequent calls if requested to do so. Speech to Speech CAs only retain this information for as long as it takes to complete the subsequent calls.

All Montana Relay Speech to Speech CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation.

## **Policies of Confidentiality**

Montana Relay's provider understands the importance and is experienced at relaying conversations promptly and accurately while maintaining the privacy of persons who use telecommunications relay services. All calls handled by the Montana Relay are totally confidential; no written or electronic script or record of any type is kept beyond the duration of

the call. Montana Relay Communication Assistants and supervisory personnel understand that they shall not reveal information about any call, at anytime, regardless of content except the minimum necessary for billing purposes. All relay personnel are required to sign a Pledge of Confidentiality promising not to disclose the identity of any callers or fellow Communication Assistants or any information learned during the course of relaying calls during their period of employment as a Communication Assistant or after termination of employment. When relaying calls or analyzing data, Hamilton follows all confidentiality practices listed here.

Following is a general outline of some of the policies Montana Relay uses to preserve confidentiality:

1. All Communication Assistants are given thorough training on the significance and importance of maintaining confidentiality from both a legal perspective and a moral perspective.
2. Before being allowed in the relay service center and before taking any live calls, Communication Assistants are required to sign a Pledge of Confidentiality. (See Pledge of Confidentiality further in this section).
3. All Communication Assistants, prior to taking any live calls or being allowed in the relay center, are given a copy of Montana Relay's policies of confidentiality in addition to a copy of their signed Pledge of Confidentiality.
4. Montana Relay's policy requires immediate termination for any violation of confidentiality.

Montana Relay has additional protocols in place to prevent an unintentional disclosure of relayed conversations. The Communication Assistants' Procedure Handbook includes rules and regulations which must be followed to prevent any unintentional disclosure of confidential information. A whole section of this handbook is dedicated to the importance of confidentiality. From day one of the training program, Communication Assistants are taught how to work in a "confidential" environment.

The actual physical facility, in which the Communication Assistants perform their specialized duties, is located in a physically separated, private room, at the offices of Hamilton at 1006 12<sup>th</sup> Street, Aurora, Nebraska, 68818. The room is clearly marked prohibiting any unauthorized access.

#### Confidentiality During Training

When training new Communication Assistants by sharing past experiences, trainers do not reveal any of the following information:

- (1) Names, genders, or ages of the parties involved in the call
- (2) Originating or terminating points of the call
- (3) Specifics of the information conveyed

**Discussion of Calls**

Montana Relay Communication Assistants understand that they shall not discuss, even amongst themselves or their supervisors, any names or specifics of any relay call except in instances of resolving complaints. Montana Relay Communication Assistants also understand that they may discuss the general situation surrounding a call with their supervisor in order to clarify how to handle a particular type of relay call and for that limited purpose only. Communication Assistants are trained to ask questions about procedures without revealing names or specific information that will identify callers. They are also trained to recognize emergency or life threatening situations and understand those circumstances in which the Communication Assistant may disclose names and specific information in order to expeditiously address the situation.

**Watching or Listening of Actual Calls**

No one is allowed to watch or listen to actual calls other than the Communication Assistant.

## **PLEDGE OF CONFIDENTIALITY**

I, the undersigned Relay Service Communication Assistant for the Relay Center, do hereby recognize the serious and confidential nature of this position and therefore promise in all good faith and conscience to abide by the following guidelines:

- 1) Under no circumstances will I disclose to an individual the identity of any caller or information I may learn about a caller while relaying his/her messages.
- 2) Under no circumstances will I act upon any information I may learn while relaying a call.
- 3) Under no circumstances will I disclose to anyone the names, schedules or personal information of any fellow Relay Service Communication Assistant or supervisor working at the Relay Center.
- 4) I will not share any information about a caller with any person with the exception of relay center supervisory personnel and then only to the extent necessary to resolve complaints, collect or clarify personal information necessary to provide and bill for relay services, such general information as may be necessary for the supervisor to assist in clarifying how to process a particular type of relay call, and such specific information as may be necessary for a supervisor to assist in expeditiously addressing an emergency situation.
- 5) In the event of my resignation or termination of my employment, I will continue to hold in strictest confidence all information related to the work I have performed as a Relay Service Communication Assistant.

Name (sign) \_\_\_\_\_

Name (print) \_\_\_\_\_

Date \_\_\_\_\_

## **Violation of Confidentiality**

Montana Relay's policy requires immediate termination for any violation of confidentiality.

Any of Montana Relay's Communication Assistants or supervisors who, after an investigation have been found to violate the confidentiality rules and regulations will be terminated immediately. If a consumer would allege a violation of confidentiality and the same was reported to the relay center or to the MTAP in any manner, Montana Relay's policy would be to first investigate the alleged violation internally and make a written report both for the complaint file of the relay service as well as for the personnel file of the individual or individuals alleged to be involved. If a violation was found to have occurred those parties responsible for the violation would be terminated immediately.

### *(3) Types of calls.*

*(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.*

*(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.*

*(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.*

Montana Relay does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Montana Relay has never requested that a relay user finish early. Montana Relay will continue to manage its traffic loads in a manner which will not require it to ask customers to call back later under any circumstances.

Montana Relay is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Montana Relay also is able to process credit cards, any Montana local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards. Relay users simply inform Montana Relay CAs when they want to use an alternate form of billing. The CA selects the correct billing method from an on-screen menu and the call is then placed. The customer's carrier of choice bills the call (based on conversation time) for intralata, interlata, and international calls.

## **Coin Sent Paid**

Montana Relay is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. Coin sent paid calls cannot be processed through the relay due to a lack of existing technology. The technology and networks between the common carrier network, payphones, and relay do not allow for signaling to be passed so that a Communication

Assistant can determine when coins have been dropped into the payphone. The FCC ordered that coin sent paid calls are not feasible.

Montana Relay does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice then rates and bill any long distance payphone calls. Once billing has been established the call is processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

### **Cellular/Wireless/PCS Phone Access**

Montana Relay is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call. The relay switch is compatible with the Public Switched Network. There is no difference in how voice or text initiated calls through relay are processed over wireless devices.

Montana Relay treats wireless call types just the same as any other call type and processes the call identically ensuring accurate billing by the wireless provider. Montana Relay has DTMF boxes at each workstation to perform dialing or access functions for relay users. DTMF boxes send tones that activate automated voice systems and pagers. Relay users can use wireless devices to call through relay including pagers. With DTMF capability, Montana Relay can navigate voice menus, answering machines, or any other automated system that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

The only time Montana Relay has experienced difficulty with wireless services is when a call originates from a non-feature group D office (that does not forward the correct ANI information). Although the majority of the time, this is not an issue, there are occasions when a wireless switch sends false ANI information on wireless calls and the CA needs to ask for an alternate form of billing.

For calls originating in areas where false ANI information is forwarded, Montana Relay's provider has developed an interim solution. The relay switch identifies wireless calls. When a wireless call has a false ANI associated with it, Montana Relay processes the call as "no bill" preventing the relay user from having to use alternate form of billing.

### **Directory Assistance**

Montana Relay gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests.

Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies the relay and asks for

the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

- **End User Billing for Directory Assistance**

The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice bills for interlata and intralata directory assistance calls at their tariffed rate. With intralata presubscription, all billing is performed by the customer's carrier. All directory assistance calls are sent to the customers' carrier of choice for processing and billing. Montana Relay does not set any rates for long distance or operator assisted calls since the customer's carrier of choice bills these calls. All directory assistance calls are billed via the customers long distance carrier.

**Montana Relay will continue to meet and adhere to all FCC requirements for all types of calls.**

## **Network Access**

Montana Relay provides functionally-equivalent network access for its users. This includes access to local, intrastate (including intralata and interlata), interstate, and international call types.

Montana Relay's system provides for and serves all of the following types of calls. All trunks today are provisioned to be accessible from any jurisdiction.

- (1) Local calls originating and terminating within Montana, including EAS and optional calling plan calls
- (2) Intralata, interstate calls which are considered local calls – Billed to the TRS Interstate Fund (NECA)
- (3) Intralata calls originating and terminating within Montana
- (4) Intrastate, interlata calls originating and terminating in Montana
- (5) Interstate calls that originate within Montana and terminate outside of Montana - Billed to the TRS Interstate Fund (NECA)
- (6) Interstate calls that originate outside of Montana and terminate in Montana - Billed to the TRS Interstate Fund (NECA)
- (7) Interstate calls that originate outside of Montana and terminate outside of Montana - Billed to the TRS Interstate Fund (NECA)

Montana Relay 800 numbers, including 711, are able to place call types 1-7. Montana Relay's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform includes necessary information about extended area service and optional calling plan arrangements in Montana so that calls made within an EAS area or optional calling area are not billed to the customer. ANI information appears at the workstation automatically and the terminating number is keyed in by the Communication Assistant so that a billing record can be created. For calls originating in areas where ANI information is not forwarded, Montana Relay Communication Assistants will key in originating number information.

Montana Relay does not charge users for use of the relay service. Users access the relay service via toll-free 800 numbers, which are accessible anywhere in the United States or by dialing 711. Calling and called parties bear no charges for calls originating and terminating within the same toll-free local calling area, including all Extended Area Service (EAS) locations and/or local optional calling plan data.

### **Local and Intrastate Relay Calling**

Montana Relay provides local and intrastate calling to its users and has obtained the necessary information (NPA/NXX) to build a database to identify the difference between local and intrastate calls (including expanded local information).

Montana Relay has contacted the LECs within Montana to collect all EAS and local optional calling plan information. Montana Relay has updated its database within its switching platform and its toll processing system to identify certain NPA-NXXs as toll-free calling areas. Relay users with access to optional calling plans are not billed any more for calls to the specific optional calling area than if they would have called directly through their local network.

The calling party's ANI is compared to the called number. The relay database used by Montana Relay determines if it is a local or intrastate toll call and gives the Communication Assistant notification if billing information is required. If it is a local call, no billing arrangements are necessary and there are no charges. If it is a toll call, Montana Relay sends the call to the customer's carrier of choice for billing purposes.

The entire call process and CA procedures used by Montana Relay are designed to make the relay center seem invisible. To the relay user, a call looks like it was placed from his or her primary location to the call destination. **Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local calls. Intrastate/intralata calls are billed by the customer's carrier.**

### **Access to Regionally Directed Toll-Free Numbers**

Montana Relay allows access to regionally directed toll-free numbers. Because Montana Relay passes true Caller ID information, the caller's ANI reflect a Montana number which results in the call being routed to the correct state or regional location.

### **Access to Restricted Toll Free Numbers**

The service provided by Montana Relay allows access to restricted 800 numbers and other special prefixes. Montana Relay is providing this service today through an incumbent LEC via re-originating dial tone. Montana Relay makes sure that all of the relay users in Montana have access to all 800 numbers and other special prefixes.

### **Access to Businesses with Special Prefixes**

Montana Relay understands that some local telephone companies have abbreviated numbers available for services calls. Montana Relay will continue to work with Local Exchange Carriers to ensure proper routing and will allow Montana relay users to access businesses with special prefixes.



## **Relaying Interstate and International Long Distance Calls**

Montana Relay provides interstate and international calling to its relay users. As stated in the previous section, Montana Relay does not bill any long distance calls and thus is not in control of other carrier's discounts for relay calls. Montana Relay does provide to relay users a list of carriers available through the relay with customer service numbers so that a relay user can call any long distance company of their choosing to gather rate information, sign up for a relay discount, etc.

Following in this section is a complete description of how users are billed for long distance relay calls.

## **Inbound International Calls**

Montana Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Montana Relay then places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

## **End User Billing for all Toll Calls**

Interlata (including interstate and international) and intralata long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interstate and intrastate long distance calls. On each interlata and intralata call, Montana Relay forwards the appropriate information digits, calling number and called number call as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

Montana Relay forwards information on each toll call to the relay user's carrier at the time the relay call actually takes place. The record contains: the originating and terminating numbers and the call type (e.g., person-to person, collect). Interlata and intralata billing records are created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Long distance charges are based on the originating and terminating numbers. The location of the relay center does not affect billing. **The long distance carrier bills based on conversation time using their own rounding calculations. Montana Relay does not pass on session time to the carrier so only conversation time is billed by the carrier.** Billing and collection is then the responsibility of the interexchange carrier who carries the call.

The format of the bill for all toll calls are determined by the carrier as Montana Relay does not bill any relay calls. However, the call digit information will identify the call as a Montana TRS call and will further designate the type of call (i.e. 3rd number call, direct dial call, collect call, and person-to-person call). This allows carriers to correctly identify each relay call on their bill.

All billing to the relay user is based on minutes of conversation and is processed by the relay user's carrier of choice.

Montana Relay has the ability to place the following call types:

Bill to ANI	Person to Person
Third Party	PP - Bill to ANI
Collect	PP – Third Party
Calling Card/Credit Card	PP – Collect
Prepaid Calling Cards	PP – Calling Card/Credit Card

### **Automated Billing System to Determine Call Jurisdiction**

Montana Relay makes use of an automated billing system to determine call jurisdiction. Montana Relay marks on every billing record whether the call is local, EAS, intrastate or interstate. This is done immediately when the call is placed. Montana Relay performs a second check of call jurisdiction during the monthly settlement process. In addition to redundant jurisdiction look-ups, Montana Relay also accounts for every minute of relay use. This means that all reports must balance at the end of every month in each jurisdiction category. This additional safeguard ensures that all minutes are accounted for correctly. Montana Relay bills the Interstate TRS Fund Administrator for all interstate minutes.

*(iv) Relay services shall be capable of handling pay-per-call calls.*

### **Pay-Per-Call Services**

Montana Relay allows relay users to access intrastate and interstate 800, 900 and 976 pay-per-call services in which the company providing the service bills the end-user directly. **Montana Relay has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.**

A relay user simply calls the TTY relay number and gives the 800, 900 or 976 number to the CA. The CA places the call as usual and begins relaying the call. On all 900 or 976 numbers, Montana Relay CAs type the dollar amount per minute associated with the call to the TTY user and asks him/her if he/she want to continue the call before charges begin. **This is the point in which callers can disconnect without being charged.** The calling party is billed for the call by the 900-service provider or the carrier, whichever is appropriate. Montana Relay's provider bills the Interstate TRS Fund and the MTAP using the percentage split defined by the Interstate TRS Fund Administrator for 800, 900, and 976 calls.

Customers who do not want 976/900 calls made from their telephone line through the relay, can complete a customer profile form. The customer profile contains an option that will block 900 and 976 calls made through the relay. This prevents anyone from calling a 900 or 976 from that particular telephone line. If someone tries to call a 900 or 976 number through the relay from a line that has a block on it, the CA will receive notification at the workstation that this call is blocked and will not be able to place the call.

*(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.*

## **TTY/ASCII to Voice**

Montana Relay is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link. Following is an explanation of how Montana Relay processes its TTY/ASCII relay calls.

Once the call is connected, the Communication Assistant sends a macro:

"MTRS CA# \_\_\_\_ M/F number to call pls Q GA." The Communication Assistant dials the number requested and informs the TTY user of the status of the call via the keyboard (dialing, ringing, line busy, party not available, party available, explaining relay, etc.) If the called party has not received a relay call before and the TTY user has not requested otherwise, the Communication Assistant explains what relay is and how it works before beginning to relay the call. The TTY user then types the initial message, and the Communication Assistant verbally repeats this to the called party.

## **Voice to Text Call Processing**

Montana Relay is able to accept a call from a hearing and voice capable caller, place a call to TTY equipped caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link. Following is an explanation of how Montana Relay processes its Voice relay calls.

Montana Relay's Communication Assistant answers: "Montana Relay CA #\_\_\_\_\_. Number to call please." The Communication Assistant extends the call to the called number and informs the voice caller of the status of the call (dialing, ringing, line busy, party not available, party available, explaining relay, etc.). If the called party has not received a relay call before and the voice user has not requested otherwise, the Communication Assistant explains what relay is and how it works before beginning to relay the call. The voice caller then begins the initial message that the Communication Assistant types to the called party.

## **Voice Carryover (VCO)**

Voice Carryover (VCO) provides relay users with the ability to call to or receive a call from a voice-capable caller who is hearing-disabled permitting the caller to speak his or her own message directly to a call recipient who is hearing-capable without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. Montana Relay allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say "VCO" and Montana Relay connects the call. **Voice users do not hear tones during a VCO call.**

Montana Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. As discussed in detail further in this Tab, a variety of VCO call types are also available through Montana Relay.

The following is a comprehensive description of the method used to achieve this type of service.

A voice person receiving a call from a VCO user will experience the following:

“This is Montana Relay CA # \_\_\_\_\_ with a call from someone who may be deaf or hard of hearing and uses Voice Carry Over. Have you received a relay call before?”

At the same time, the CA will type to the VCO user the terminator’s greeting and gender (i.e. HELLO (M)).

If the voice party answers “Yes,”

The CA will VOICE: “Have you received a Voice Carry Over call before?”

If the party answers “Yes,”

The CA will VOICE: “One moment for your conversation to begin.”

If the party answers “No,” the CA will send a macro (EXPLAINING RELAY) to the VCO user and will voice: “The person calling you through the relay uses Voice Carry Over. You will hear the person speaking directly to you. When the caller says, “Go Ahead”, it is your turn to talk. Then I will simply type everything I hear on your end of the line, so please talk slowly and directly to your caller. Please say “Go Ahead” when you are finished speaking. One moment and you will hear your caller’s voice.”

## **Two-Line VCO**

Montana Relay provides **two-line VCO** capability which allows a VCO user to have a more interactive conversation. By using two telephone lines, the caller can listen to their conversation if they have some hearing available, on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

### **Announcement:**

No announcement unless specifically requested.

### **Explanation:**

When voice party answers, the CA will type their greeting and gender to the 2LVCO user i.e. HELLO (M)

The CA will continue typing everything voice party says during the conversation. The CA does not use “GA” or wait for “GA” during the conversation. The CA types only what the Voice user says and DOES NOT type what the 2LVCO user says. May summarize if necessary.

## **Reverse Two-line VCO**

Montana Relay’s Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

## **VCO-TTY and TTY-VCO**

Montana Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

### **Announcement to TTY Terminator:**

The CA will type: MTRS CA# \_\_\_\_ with a call from vco user (gender) ga

### **CONVERSATION BEGINS**

The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

### **Explanation to TTY Terminator:**

I will type your caller's conversation to you. You will type directly to them.

In addition, Montana Relay will provide VCO to TTY or ASCII services as well as all other combination of call types involving VCO.

## **VCO-VCO**

This service allows two VCO users to contact each other through the relay. Montana Relay provides VCO to VCO service where the CA types to both parties, preventing the VCO users from having to type their part of the conversation.

### **Announcement:**

The CA will type: "MTRS CA# \_\_\_\_ with a call from vco user (gender) ga"

When the terminator requests VCO, the CA will connect VCO and type: "VCO on ga"

### **CONVERSATION BEGINS**

The CA will then type all conversation from the terminator to the originator and vice versa.

### **Explanation:**

"The person calling you is also using Voice Carry Over. I will type your voiced responses to each other."

## **Hearing Carryover (HCO)**

This feature allows relay users to place calls to or receive calls from a hearing-capable caller who is speech disabled permitting the caller to hear the communication directly from the call recipient without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party.

Montana Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. As discussed in detail further in this Tab, a variety of HCO call types are also available through Montana relay.

A voice person receiving a call from an HCO user will experience the following:

“This is Montana Relay CA # \_\_\_\_\_ with a call from someone who may be speech disabled and uses Hearing Carry Over. Have you received a relay call before?”

If the party answers “Yes,”

The CA will VOICE: “Have you received a Hearing Carry Over call before?”

If the party answers, “Yes,”

The CA will VOICE: “One moment for your conversation to begin.”

If the party answers “No,”

The CA will VOICE: “The person calling you through the relay uses Hearing Carry Over. The caller can hear you and I will simply read your caller’s typed response to you. When I say, “Go Ahead”, it is your turn to talk. Please talk directly to your caller and say, “Go Ahead”, when you are finished speaking. One moment for your conversation to begin.”

## **Two-Line HCO**

Montana Relay provides **two-line HCO** capability. To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

The CA will identify the call to the voice terminator using the language described in the previous section. If the voice party is not familiar, the CA will use the following explanation:

“The person calling you through the relay uses Hearing Carry Over. The caller can hear you and I will simply read your caller’s typed response to you. Please talk directly to your caller.”

## **HCO-TTY and TTY-HCO**

This feature allows HCO users to contact TTY users (or vice versa) via the relay. The CA will voice the TTY user’s typed conversation to the HCO user. The TTY user receives the HCO user’s typed conversation directly from the HCO user.

### **Announcement:**

The CA will type: “MTRS CA# \_\_\_\_ with a call from hco user (gender) ga”

CONVERSATION BEGINS

The CA will voice the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

**Explanation:**

"I will voice what you type to them. They will type directly to your TTY."

**HCO-HCO**

This service allows two HCO users to contact each other through the relay. Montana Relay provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation. This is a great relay enhancement and Montana Relay is pleased to offer it to relay users.

**Announcement:**

The CA will type: MTRS CA# \_\_\_\_ with a call from hco user (gender) ga

When the terminator requests HCO, the CA will connect HCO and voice: "HCO on ga"

**CONVERSATION BEGINS**

The CA will then voice all conversation from the terminator to the originator and vice versa.

**Explanation:**

"The person calling you is also using Hearing Carry Over. You will hear me as I read your typed responses to each other."

*(vi) TRS providers are required to provide the following features:*

*(1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.*

**TTY to TTY Call Release**

Montana Relay processes TTY to TTY calls when it is necessary to go through a voice switchboard first, or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Montana Relay gives the calling party the option to communicate independent of the relay function. The CA types to the terminating TTY user, "TTY TO TTY CALL ONE MOMENT PLS."

The CA then types to the originating party, "(CA HERE YOU ARE CONNECTED TTY TO TTY WHEN YOUR CALL IS FINISHED CALL BACK TO RELAY TO MAKE A RELAY CALL OR JUST HANG UP ONE MOMENT PLS)."

Once the CA sees the two TTY parties are able to read each other, the CA types, (CA HERE YOU MAY BEGIN YOUR CONVERSATION NOW) GA.

**The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.**

Using the above procedure, Montana Relay provides a true call release function to satisfy the FCC requirement, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice).

### **Voice to Voice Call Release**

Montana Relay provides Voice to Voice call release which allows a hearing user to connect to another hearing user via the Relay. This happening is usually inadvertent. Rather than blocking the call, this feature allows the CA to be "released" from the telephone line without triggering a disconnection between two hearing users. The CA releases the call after the CA connects the originating hearing caller to the hearing called party.

Once the CA hears the two hearing parties are able to communicate with each other, the CA states, "CA HERE YOU MAY BEGIN YOUR CONVERSATION NOW".

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.

Using the above procedure, Montana Relay provides a voice to voice call release function, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice). Once the call has been released from the workstation, the call ceases to be a TRS call and is not subject to the per-minute charge to the State.

### **Speed dialing**

Montana Relay has developed a customer profile for relay users to indicate calling preferences. Customer profile information is presented to the CA each time the relay user calls the relay and includes the option of Speed Dialing. In the Speed Dialing section of the Customer Profile form, customers list the first name and phone number of people they call often through the relay. When a customer wants to call that person, they simply instruct the CA to call that person. There is no need to give the number to the CA.

### **Three-way calling**

In compliance with the FCC Order released on June 17, 2003, Montana Relay provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

*(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain*



*them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.*

## **Machine Recording Capabilities**

Montana Relay has a recording function that allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system. Keys on the keyboard are used to control the speed of the recording ensuring the message is transmitted accurately by the CA. This makes the recording function very easy for Communication Assistants to use.

Whenever Montana Relay has to redial to an answering machine, voice mail, interactive voice messaging unit, or any other type of recording system, for whatever reason, Montana Relay does so without billing the customer for any subsequent long distance relay calls.

## **Answering Machine Procedures**

Communication Assistants are trained to relay recorded messages and leave recorded messages on telephone answering machines or hang up at the request of the caller.

Answering Machine procedures are as follows:

- Communication Assistant informs the relay calling party that an answering machine has been reached.
- The relay user can tell the Communication Assistant to simply leave a message if they do not want the Communication Assistant to type the entire recording. Otherwise, the Communication Assistant types the entire answering machine message. The Communication Assistant records messages and convey the message in its entirety.
- The CA asks the caller if they want to leave a message.
- If the calling party would like to leave a message, the Communication Assistant either voices or types the message onto the answering machine.

- Communication Assistant notifies the calling party that the message has been left.
- The relay customer is only be charged for the first call to the answering machine, if a toll call, regardless of the number of calls that may be required to retrieve and convey the answering machine message and/or to leave a message.

**If the relay user gives the CA directions of how they want the call handled, the CA follows the user's directions. The customer's directions always override established procedures.**

*(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.*

### **Answering Machine and Voice Mail Retrieval**

Communication Assistants are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants use the following procedures to obtain messages for relay users:

1. The user is informed that the Communication Assistant has reached a voice processing system.
2. If the user requests message retrieval, Montana Relay obtains the appropriate access codes from the user. Montana Relay does not retain access codes or any other information needed to access a voice mail system subsequent to the call. ***This information is considered "call" information and just like any other call information, is kept totally confidential.***
3. After the voice processing system has been accessed, Montana Relay Communication Assistants begin to relay any messages that have been recorded or leave a message as requested. Montana Relay makes use of its advanced recording function to capture this information as discussed previously.
4. If the Communication Assistants must call again to finish relaying any messages, Montana Relay Communication Assistants do so without billing the end user for subsequent calls.

Montana Relay alerts relay users to the presence of a recorded message and/or interactive menu. Montana Relay uses hot keys (automated macros) to announce recordings or interactive messages. Montana Relay does not charge a relay user for subsequent calls to a recording or interactive messages.

### **Answering Machine Retrieval (Single-Line)**

Montana Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistants by putting the handset near the speaker of the answering machine. The technology used by Montana Relay records any messages, enabling the Communication Assistants to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

*(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.*

### **The Procedure used by Montana Relay for Handling Emergency Calls**

Montana Relay makes use of a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

Montana Relay has had great success with Intrado and follows the procedures below:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.
- In the event that the caller does not have the access number to 911 and the emergency appears to be of such a nature that time will not permit the caller to hang up and call directly to 911, the CA will contact the Emergency Call Relay Center (ECRC) which is accomplished through one stroke on the keyboard.
- Simultaneously, the CA obtains the address from which the person is calling from and selects the “emergency call” box option on the software at the workstation. (A Supervisor assists every 911 call. When a Communication Assistant makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)
- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)
- The ECRC immediately transfers the call to the appropriate PSAP center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.
- Montana Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

### **Back-up Emergency Procedures**

- As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Montana Relay has procedures in place to access its own emergency database.
- The software used by Montana Relay takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of towns and locations in the State of Montana stored in the database. Montana Relay has mapped each NPA/NXX in Montana to the appropriate PSAP. Once this search is complete

(it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the Communication Assistant can immediately dial the appropriate emergency personnel. This process ensures that Montana Relay users have access to the correct and appropriate PSAP when their call is handled in any Hamilton facility.

- Montana Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.
- If the caller is using a cellular phone, the ANI is not a good indication of where the caller is actually calling from. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.
- Montana Relay's emergency database application described above meets the new requirements established by the FCC.

### **FCC Rules for Emergency Calls**

In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." The database used by Montana Relay automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Montana Relay accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP: 1) through the use of Intrado's 9-1-1 infrastructure and 2) through the PSAP database maintained by Montana Relay's provider.

### **TTY to TTY Communications Between PSAP and Caller**

Montana Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.

### **If a Caller Disconnects Before Being Connected to the PSAP**

In the event that a caller disconnects before being connected to the PSAP even if the CA is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, Montana Relay can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from.

Montana Relay is not intending to be a 911 center; however, as stated above we will not turn away an emergency situation and Montana Relay will take all reasonable steps possible to get the call placed and summon any necessary help. During the course of any such calls, the CA continually attempts to solicit as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has “Enhanced 911 Services”, emergency personnel will be able to locate where the person in need is calling from. This meets the FCC’s new requirement where a CA must pass along the caller’s telephone number to the Public Service Answering Point (PSAP) when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help. If time allows, the CA will let the relay user give this information to the dispatcher through normal call practices.

**The emergency call plan used by Montana Relay follows this section. This covers the scenario of a relay user disconnecting before the call is completed.** If the 911 call is completed, the CA will follow normal relay procedures with the assistance of a supervisor and the caller’s ANI is transferred to the appropriate PSAP as described above.

# 911 Procedures

## **If the caller disconnects before the emergency call to the PSAP is completed:**

Call the 911 Dispatch number that is listed in the Emergencyfile.txt or the emergency dispatch numbers file ASAP (all of this is immediately available on the CA's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:

- A. **Greeting:** This is "CA XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
- B. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "C". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "C". If they know how to use the TTY proceed to item "E".
- C. Give the 911 dispatch operator the Voice relay number for the correct state.
  1. LA 800-947-5277
  2. WI 800-947-6644
  3. KY 800-648-6057
  4. NE 800-833-0920
  5. ID 800-377-1363
  6. RI 800-745-6575
  7. ME 800-457-1220
  8. WY: 800-877-9975
  9. IA: 800-735-2943
  10. MT: 866-253-4090
  11. GA: 800-255-0135
  12. WV 800-982-8772
  13. AZ 800-842-4681
  14. KS 800-766-3777
  15. MD 800-201-7165
  16. Saipan: 866-339-9384
  17. Virgin Islands: 800-809-8477
- D. Ask the 911 dispatch operator if they know how to use the relay. If yes proceed to item "E".
  1. Relay Explanation  
The person you are calling through relay will be typing their conversation and the CA will read it to you.
- E. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Complete the Supervisor Emergency Call Slip in the Emergency Dispatch Numbers folder.

**Montana Relay currently handles emergency calls as expeditiously and effectively as possible even though the center is not designed to be a substitute for 911 centers.**

Through its outreach programs and outreach materials, Montana Relay educates relay users about how to use 911 services. As a part of this information, Montana Relay encourages relay users to call 911 direct and to contact their local emergency service personnel using a TTY to ensure that the 911 center will process a TTY call correctly if there ever were an actual emergency.

In addition, Montana Relay gives presentations to 911 centers routinely as part of its outreach program. Montana Relay provides training and other assistance to emergency dispatchers to ensure TTY calls or relay calls are handled correctly.

*(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.*

## **Speech to Speech**

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.

Montana Relay's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

Prior to all outgoing calls, STS CAs verify the number for accuracy and then repeat the number when dialing out. This verification process is repeated for all busy numbers after dialing out and receiving a busy signal.

STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation. The STS CA may retain information only for subsequent calls.

Montana Relay provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. **Montana Relay has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA, the CA repeats the name and state the number of the person to call. The Speed Dial feature is of great benefit to STS users.**

Montana Relay complies with the 15-minute requirement prior to changing STS CAs. STS CAs understand the difficulties involved in changing CAs and only request a relief under emergency

circumstances. A Supervisor must approve and facilitate a STS CA change. Montana Relay STS CAs truly care about STS consumers and are willing to stay with a call until completion even at the end of a shift, at lunch time or break time. Montana Relay exceeds the FCC standard for substitution of STS CAs.

If a change in STS CA is necessary, another CA will replace the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties. The replacement STS CA will announce, "This is CA# \_\_\_\_ continuing your call." A supervisor monitors the change and must approve the change based on the caller's request or emergency circumstances.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Montana Relay places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.

With a staff of highly trained STS CAs, Montana Relay provides the best service possible to an emerging group of relay users.